

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

HOUSING AND REDEVELOPMENT
AUTHORITY OF REDWOOD FALLS,

Case No.: _____

Plaintiff,

vs.

HOUSING AUTHORITY PROPERTY
INSURANCE, a MUTUAL COMPANY,

Defendant.

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1446, Defendant Housing Authority Property Insurance, a Mutual company, files this Notice of Removal to remove this civil action from the Fourth Judicial District, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, and states and alleges as follows:

1. On or about October 31, 2014, Plaintiff Housing and Redevelopment Authority of Redwood Falls (hereinafter referred to as "HRA of Redwood Falls") served a civil action Complaint upon the Defendant and filed the same on or about November 5, 2014. A true and correct copy of the pleadings served upon the Defendant is hereby attached as Exhibit A. Plaintiff's claims against the Defendant are founded in Contract.

2. The Plaintiff, HRA of Redwood Falls is an organization located in the City of Redwood Falls, organized and operating for the purposes of providing public housing to its residence. The HRA of Redwood Falls is a government agency for the City of Redwood Falls, Minnesota.

3. The Defendant, Housing Authority Property Insurance (hereinafter referred to as “HAPI”), is a corporation authorized to sell insurance in the state of Minnesota with its principal place of business in Cheshire, Connecticut. HAPI is incorporated in the state of Vermont.

4. Therefore, diversity of citizenship exists between the parties. Damages alleged by the Plaintiff exceed \$75,000.

5. This action is one in which the District Courts of the United States have original jurisdiction pursuant to 28 U.S.C. § 1332 because it is a civil action with a matter in controversy that exceeds the sum or value of \$75,000 and because there is a diversity of citizenship between the parties.

6. This Notice of Removal is filed pursuant to 28 U.S.C. § 1441 and within the time prescribed by 28 U.S.C. § 1446.

7. Defendant will give written notice of the filing of this Notice of Removal as required by 28 U.S.C. § 1446(d) and will file a copy of the Notice of Removal with the Fourth Judicial District, Hennepin County, Minnesota as required by that section.

WHEREFORE, Defendant’s pray that said action be removed to this Court, and that the Fourth Judicial District, Hennepin County, Minnesota shall proceed no further in the action pending therein.

HANSON LULIC & KRALL, LLC

Dated: November 12, 2014.

By s/Joseph F. Lulic
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